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13 Attorneys for the United States Trustee for Region 17

14 TRACY HOPE DAVIS

15 UNITED STATES BANKRUPTCY COURT

16 NORTHERN DISTRICT OF CALIFORNIA

17 SAN FRANCISCO DIVISION

18 In re:

19 FLOYD E. SQUIRES, III and
20 BETTY J. SQUIRES,

21 Debtors.

Case No: 17-10828-WJL

Chapter 11

Date: Ex Parte; OST Requested

Time: Ex Parte; OST Requested

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**DECLARATION OF TRIAL ATTORNEY JARED A. DAY IN SUPPORT OF
EX PARTE MOTION FOR ORDER SHORTENING TIME FOR HEARING ON
UNITED STATES TRUSTEE'S MOTION TO DISMISS OR CONVERT
UNDER 11 U.S.C. § 1112(b) ("MOTION")**

I, JARED A. DAY, declare as follows:

1. I am a Trial Attorney employed in the Reno, Nevada office of the United States Trustee for Region 17, which includes the Northern District of California. I have personal knowledge of the following unless stated to be on information and belief, and as to those matters, I believe them to be true. If called upon to testify, I could and would testify competently thereto.

2. The Office of the United States Trustee obtains information from bankruptcy

1 debtors regarding operating history, factors contributing to the bankruptcy filing, and the plan for
2 an effective reorganization. As part of that process, I reviewed the Debtors' Schedules,
3 Statements, and related documentation.

4 3. Debtors are required to supply the United States Trustee with certain documents
5 including proof of insurance for estate assets as prescribed by 11 U.S.C. § 1112(b)(4)(C) and the
6 United States Trustee Guidelines for Chapter 11 cases.

7 4. Failure to maintain appropriate insurance coverage that poses a risk to the estate
8 or to the public constitutes cause for dismissal or conversion under 11 U.S.C. § 1112(b)(4)(C)
9 and cause for a hearing on the matter on shortened time in this case.

10 5. No previous time modifications related to the United States Trustee's Motion
11 have been made in this case.

12 6. On February 20, 2018, I contacted, inter alia, counsel for the Debtors and counsel
13 for the City of Eureka to determine whether they are in agreement with the Motion being heard
14 on shortened time. A response has not been received by the United States Trustee as of the
15 date/time of the filing of this Declaration.

16 I declare under penalty of perjury that the foregoing is true and correct.

17 Dated: February 21, 2018

18 Respectfully Submitted,

19 By: /s/ Jared A. Day

20 JARED A. DAY

21 Trial Attorney for the United States Trustee

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